

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WORCESTER DIVISION

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ROBERT N. HARRINGTON,  
Plaintiff,

v.

JAMES M. KREIDLER, JR. AND THE  
TOWN OF WINCHENDON,  
Defendants.

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CIVIL ACTION NO. 05-40115FDS

**PLAINTIFF'S AUTOMATIC DISCLOSURES PURSUANT  
TO RULE 26 OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Now comes the Plaintiff in this action, by and through his attorney, and hereby makes the following automatic disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure:

**A. NAMES OF INDIVIDUALS LIKELY TO HAVE DISCOVERABLE  
INFORMATION:**

The following individuals may have knowledge of facts relevant to this matter:

Robert N. Harrington-Plaintiff;  
James M. Kreidler-Town of Winchendon Employee;  
Joseph Laffrennie-Town of Winchendon Employee;  
Steven Ashmore-Former Town of Winchendon Employee;  
Burton Gould-Town of Winchendon Selectman;  
Larry Sordoni-Former Winchendon Selection;  
Cindy Boucher-Former Winchendon Selection;

William Geoffroy-Town of Winchendon Employee;  
Ralph Harrington-Town of Winchendon Employee;  
Yma Offerall-Town of Winchendon Employee;  
Keith Barros-Town of Winchendon Selectman;  
John White- Former Winchendon Selection;  
Walter Moriaty-Town of Winchendon Selectman;  
Richard McAllister-Town of Winchendon Selectman;  
Alida Herring-Town of Winchendon Employee;  
Liz Gizman-Town of Winchendon Employee;  
Barbara LaFrennie- Town of Winchendon Employee;  
Major Jeffrey Laughlin-United States National Guard;  
Edward LeClair-Consultant to the Town of Winchendon;  
Frederick Cloutier-Former Town of Winchendon Employee

**B. DESCRIPTION OF RELEVANT DOCUMENTS IN PLAINTIFF'S POSSESSION, CUSTODY OR CONTROL.**

The Plaintiff has possession, custody or control over the following relevant documents:

1. Plaintiff's Employment Contract;
2. Plaintiff's Tax Returns and Wage Records;
3. Plaintiff's Orders from the National Guard;
4. Correspondence, Reports, and Records Relating to the Plaintiff's Employment with the Town of Winchendon;
5. Newspaper Articles;
6. Portions of the Plaintiff's Medical Records;
7. Transcripts and Decisions from Employment Hearings.

The above referenced documents are presently available for inspection and copying at the offices of Plaintiff's counsel.

**C. COMPUTATION OF THE PLAINTIFF'S DAMAGES**

1. The Plaintiff's estimated lost income resulting from his unlawful termination, as of December 31, 2005 is \$127,000.00. The Plaintiff does not presently have all of the

necessary information to calculate the lost income to an absolute certainty and will supplement this response. The Plaintiff continues to lose income and economic opportunities as a result of his unlawful termination and the damage to his reputation. The Plaintiff's future lost income can not presently be calculated.

2. The Plaintiff has suffered mental anguish and damage to his reputation, which damages are not subject to mathematical calculation.

3. The Plaintiff has incurred and will continue to incur legal fees as a result of this wrongful termination.

Respectfully submitted,  
Robert N. Harrington,  
By his Attorney,



L. Richard LeClair, III  
LeClair & LeClair, P.C.  
135 Beaver Street, 2<sup>nd</sup> Floor  
Waltham, Massachusetts 02452  
(781) 893-5655  
BBO# 561650